

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Case: 2:24-cr-20337
Assigned To : Hood, Denise Page
Referral Judge: Stafford, Elizabeth A.
Assign. Date : 6/27/2024
Description: IND USA V. SEALED (DJ)

v.

Violation:
18 U.S.C. § 1956

MARIA EUGENIA LANDEROS-ROSAS,
a/k/a "Jenny,"

Defendant.

_____ /

Indictment

THE GRAND JURY CHARGES:

COUNT ONE
Conspiracy to Launder Monetary Instruments
18 U.S.C. § 1956 (h)

From on or about January 1, 2022, through on or about June 24, 2024, in the Eastern District of Michigan, and elsewhere, the defendant, MARIA EUGENIA LANDEROS-ROSAS, did knowingly combine, conspire, and agree with other persons known and unknown to the Grand Jury to commit offenses in violation of Title 18, United States Code, Section 1956, to wit:

(a) to knowingly conduct and attempt to conduct financial

transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, possession of controlled substances with intent to distribute and distribution of controlled substances, in violation of Title 21, United States Code, Section 841(a)(1), and conspiracy to commit those offenses, in violation of Title 21, United States Code, Section 846, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and while conducting and attempting to conduct such financial transactions, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and

(b) to transport, transmit, and transfer, and attempt to transport, transmit, and transfer a monetary instrument or funds involving the proceeds of specified unlawful activity, that is, possession of controlled substances with intent to distribute and distribution of controlled substances, in violation of Title 21, United States Code, Section 841(a)(1), and conspiracy to commit those offenses, in violation of Title

21, United States Code, Section 846, from a place in the United States to or through a place outside the United States, knowing that the funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity, and knowing that such transportation, transmission, and transfer was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i).

All in violation of Title 18, United States Code, Section 1956(h).

COUNT TWO
Laundering of Monetary Instruments
18 U.S.C. § 1956(a)(1)(B)(i)

From on or about September 8, 2022, through on or about September 13, 2022, in the Eastern District of Michigan, and elsewhere, the defendant, MARIA EUGENIA LANDEROS-ROSAS, knowingly conducted and attempted to conduct a financial transaction affecting interstate and foreign commerce, to wit, the delivery of approximately \$250,690.00 in bulk cash, which was subsequently converted to cryptocurrency (USDC) and transferred by electronic communication, minus commissions, to a specified cryptocurrency wallet, which

transaction involved the proceeds of a specified unlawful activity, that is, possession of a controlled substance with intent to distribute and distribution of a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and conspiracy to commit those offenses, in violation of Title 21, United States Code, Section 846, knowing that the transaction was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, and knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

COUNT THREE
Laundering of Monetary Instruments
18 U.S.C. § 1956(a)(1)(B)(i)

From on or about March 31, 2023, through on or about April 5, 2023, in the Eastern District of Michigan, and elsewhere, the defendant, MARIA EUGENIA LANDEROS-ROSAS, knowingly conducted and attempted to conduct a financial transaction affecting interstate and foreign commerce, to wit, the delivery of approximately \$150,000.00 in bulk cash, which was subsequently converted to cryptocurrency (USDC)

and transferred by electronic communication, minus commissions, to a specified cryptocurrency wallet, which transaction involved the proceeds of a specified unlawful activity, that is, possession of a controlled substance with intent to distribute and distribution of a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and conspiracy to commit those offenses, in violation of Title 21, United States Code, Section 846, knowing that the transaction was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, and knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

COUNT FOUR
Laundering of Monetary Instruments
18 U.S.C. § 1956(a)(1)(B)(i)

From on or about April 4, 2023, to on or about April 7, 2023, in the Eastern District of Michigan, and elsewhere, the defendant, MARIA EUGENIA LANDEROS-ROSAS, knowingly conducted and attempted to conduct a financial transaction affecting interstate and foreign

commerce, to wit, the delivery of approximately \$199,900.00 in bulk cash, which was subsequently converted to cryptocurrency (USDC) and transferred by electronic communication, minus commissions, to a specified cryptocurrency wallet, which transaction involved the proceeds of a specified unlawful activity, that is, possession of a controlled substance with intent to distribute and distribution of a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and conspiracy to commit those offenses, in violation of Title 21, United States Code, Section 846, knowing that the transaction was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, and knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

FORFEITURE ALLEGATION
Criminal Forfeiture

Pursuant to Fed. R. Cr. P. 32.2(a), the government hereby provides notice to the defendants of its intention to seek forfeiture of all proceeds, direct or indirect, or property traceable thereto, all property

that facilitated the commission of the violations alleged, or property traceable thereto, and all property involved in, or property traceable thereto, of the violations set forth in this Indictment.

Substitute Assets: If the property described above as being subject to forfeiture, as a result of any act or omission of defendant:

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third party;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property that cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c).

Money Judgment: Upon conviction of the violation alleged in this Indictment, the United States will seek a forfeiture money judgment against Defendants in an amount equal to the total amount of proceeds

obtained as a result of violations of Title 18, United States Code,
Section 1956, as alleged in this Indictment.

THIS IS A TRUE BILL.

s/Grand Jury Foreperson
Grand Jury Foreperson

DAWN N. ISON
United States Attorney

s/Benjamin Coats
BENJAMIN COATS
Chief, Drug Task Force

s/Erin Ramamurthy
ERIN L. RAMAMURTHY
Assistant United States Attorney

s/Margaret M. Smith
MARGARET M. SMITH
Assistant United States Attorney

Dated: June 27, 2024

United States District Court
Eastern District of Michigan

Criminal Case Cover Sheet

Case: 2:24-cr-20337

Assigned To : Hood, Denise Page

Referral Judge: Stafford, Elizabeth A.

Assign. Date : 6/27/2024

Description: IND USA V. SEALED (DJ)

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete the following information.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <u>ELR</u>

Case Title: USA v. Maria Eugenia Landeros-Rosas

County where offense occurred : Wayne

Check One: ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**

☒ Indictment/ ☐ Information --- **no** prior complaint.
☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: _____]
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ **Judge:** _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

June 27, 2024

Date

Erin L. Ramamurthy
 Erin Ramamurthy
 Assistant United States Attorney
 211 W. Fort Street, Suite 2001
 Detroit, MI 48226-3277
 Phone: 313-226-9788
 Fax: 313-226-9100
 E-Mail address: Erin.Ramamurthy@usdoj.gov
 Attorney Bar #: P81645

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.